

STATE OF MARYLAND

NO. D-111-CR-23-000893

v.

**Judge Dino Ernesto Flores, Jr.**

IN THE DISTRICT COURT FOR

CHELSEA ELIZABETH PHOENIX

FREDERICK COUNTY, MD

\* \* \* \* \*

**STATE'S EMERGENCY PETITION TO REVOKE BOND AND REQUEST FOR WARRANT**

COMES NOW, the State of Maryland, by and through Lindsey M. Carpenter, Assistant State's Attorney for Frederick County, Maryland, and pursuant to Maryland Rule 4-216.3(d) moves this Honorable Court to revoke the Defendant's bond in the above-captioned case, for the following reasons:

1. On June 6, 2023 the Defendant was charged with Second Degree Rape and Third Degree Sexual Offense involving a 12 year old victim.

2. On June 9, 2023 the Defendant was released on her own recognizance and placed on pre-trial supervision through the Frederick County Sheriff's Office.

3. The Defendant was ordered to have no contact with any minors as a condition of her release.

4. Since the Defendant's release, she has sent numerous messages via social media to minors. Two of those individuals are 13 years old. The messages sent by the Defendant include requests to meet up with the minors, and several are flirtatious in nature.

5. The State further has learned that the Defendant had a minor over at the residence where she is currently residing.

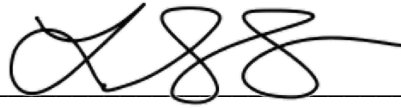
6. At a motion hearing this morning, the condition of pre-trial supervision was struck as the Frederick County Sheriff's Office cannot provide pre-trial supervision in this case due to the nature of the charges.

7. The Defendant was notified this morning regarding the evidence that the State obtained through her social media accounts. Since the hearing this morning the Defendant has changed her passwords as to not allow her accounts to be monitored any more.

8. The Defendant continues to have contact with minors, similar in age and gender to the minor victim in this case, in direct violation of her release conditions.

9. The State believes that the Defendant is a danger to the public, and specifically to minors.

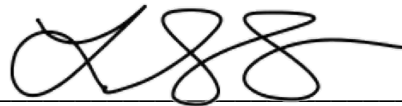
WHEREFORE, as the Defendant has violated her pretrial release conditions by having contact with minors the State respectfully requests this Honorable Court issue a warrant and revoke the Defendant's bond.



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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 28<sup>th</sup> day of June, 2023, a copy of the foregoing State's Petition to Revoke Bond was sent via MDEC and/or Sharefile, a secure file sharing service, to the designated e-mail address and/or service contact for Leslie Guthrie, Esquire, the Attorney for the Defendant herein.



LINDSEY M. CARPENTER  
ASSISTANT STATE'S ATTORNEY